

ORIGINAL

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

FILED-USDC-NDTX-DA  
'24 JUL 10 PM1:13  
KMB

Margaret M. Woods

Plaintiff,

v.

Delta Air Lines, Inc.

Defendant.

Civil Action No. **3-24CV1759-B**

**JURY TRIAL DEMANDED.**

**COMPLAINT**

On this 10<sup>th</sup> day of July 2024, submitted to the Norther District Court of Texas Margaret M Woods (Ms. Woods) claim of retaliation<sup>1</sup>, race and sex discrimination are presented. Delta Air Lines, Inc. (DAL) communicated that Ms. Woods reason for termination was because a DAL employee (John Zwicke) allegedly stated he “felt uncomfortable with reading Ms. Woods counselling letter.” In fact, Ms. Woods never showed him the letter. If statement was made, it was coerced to prevent exposing the discrimination and wrongful acts of two other white, male employee’s (Ken Poverud statement) [Attachment A] and (James Swann statement) [Attachment B]. The retaliation and discrimination conducted by Delta Air Lines, Inc (DAL), disrupted Ms. Woods’ employment,

<sup>1</sup> The protected activity I was engaged in was, addressing concerns of being cursed by one white male ~May 23<sup>rd</sup>, 2022, and mocked by another white male on June 7<sup>th</sup>, 2023, both of whom were Delta Air Lines. My immediate Managers at Delta Air Lines were informed of both situations. Ken Poverud, the employee who initiated this investigation always talked very harsh and disrespectful to me. Yet Ken P. asked me one day before I received investigation notice if I was applying for any of the open departmental positions at Delta QA. I professionally requested respect from both employees at the time of each incident in effort to avoid Human Resources involvement because I was a contractor and was next in line for direct hire within the department.

livelihood, physical and mental states violated Title VII of the Civil Rights Act of 1964, as Amended.

**PRELIMINARY STATEMENT**

1. Delta Air Lines hastily communicated an alleged investigation whereas;
  - Ms. Woods informed the HR members and Ken Flemming of the incorrect sequencing of events and inaccuracies reported to them by Ken Poverud.
  - Ms. Woods' information and complaints of being cursed and wrongfully accused of harassment, went unaddressed.
  - Security searches of Ms. Woods' computer began.
  - Frequent drug screenings submission for Ms. Woods began.
  - Character Defamation began, as DAL communicated misleading statements (lies), by issuing Ms. Woods a counselling letter, which was all supported by AllSourcePPS.
  - Various attempts by DAL attempting log into Ms. Woods Bank account from her company issued asset, after her termination when assets were returned to DAL

**[Attachment C]**

2. On or about the 8<sup>th</sup> of June 2022, Ken Poverud called Ken Flemming and made false complaint against Ms. Woods. Ms. Woods strongly believes this was done to gain favor of protection and to alter Ms. Woods long term employment with the company.

3. Patrick Mills (Delta QA Oversight Manager), and John Baker (Delta QA Oversight Manager) explained to Ms. Woods that she was next in line of the upcoming six new Delta Air Lines direct hires for the QA Oversight team. However, a wrongful 'alleged' investigation was pursued, and Ken Fleming (General Manager) led the prolonged investigation while stonewalling information

requests from Ms. Woods, until Delta filled the positions with 4 in-house [**Attachment E**]. Ken Flemming also directed both front line QA Oversight Managers (Patrick Mills and John Baker) not to speak to me concerning the investigation. This was a damning act experienced by Ms. Woods. Yet, when Ms. Woods spoke at the staff meeting to request a call back from my direct management after hearing the announcement of newly named Direct hires, she never received a call. Instead, she received a platter of cheese served to my hotel room and unknowingly to her, a last supper during this employment, which was announced as a courtesy of Ken Flemmings.

4. Ms. Woods was harassed, slighted, discriminated against and wrongfully terminated by Delta Air Lines, Inc. Ms. Woods direct Manager (Black-male) was prohibited from speaking to her about the investigation nor was he allowed to partake in the investigation.

5. Delta Employee (John Zwicke) who allegedly made the statement of feeling uncomfortable, initiated the morning discussion on the way to work. In Fact, John Zwicke ended the conversation with commenting on the strength and depth of the “Good Ole Boys.” Delta Air Lines violated Ms. Woods Civils Right and railroaded her as an escape to protect Ken Poverud (white male) and James Swann (white male).

6. As a black female, Ms. Woods was treated different than that of the white females and white males. In fact, a white male was terminated from disrespecting and harassing a white female (Lisa). Yet, Ms. Woods a black female is disrespected and harassed, and Ms. Woods gets railroaded by white males and terminated for speaking up for her rights.

7. On the 4<sup>th</sup> of October 2022, Ms. Woods’ subsequent termination [**Attachment D**], received no support from AllSourcePPS recruiting representative nor HR. Ms. Woods stated to DAL and AllSourcePPS HR, Jan Sizer that this was racist, sexist and that she was being railroaded.



8. Ms. Woods had to take a job over 3 hours from home just to pay rent, making 45% less than what she was earning at AllSourcePPS. During that employment period, she also experienced dreadful living conditions because she had to reside in her vehicle. This caused Ms. Woods and her disabled dependents great physical, financial and mental anguish.

### **JURISDICTION AND VENUE**

9. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343, as violations have been asserted and raise question of the Plaintiff's deprived rights. The court has supplemental jurisdiction over plaintiff's related claims that may arise under state and city law pursuant to 28 U.S.C. § 1376(a).

### **PARTIES**

10. The Plaintiff, Margaret M. Woods (Ms. Woods) at all times relevant hereto, is a black adult female citizen of the State of Texas and now resides in Ellis County.

11. The Defendant, Delta Air Lines, Inc. (DAL) at all times relevant hereto, is a corporation incorporated under the laws of the State of Georgia and is authorized to do business as a foreign corporation in this State.

### **FACTUAL ALLEGATIONS**

12. On or about the 6<sup>th</sup> of May 2021, post a phone interview with Patrick Mills (black male) and Bryan Frerichs (white male), Ms. Woods and Defendant entered into a verbal employment agreement, post a phone interview.

13. On or about the 2<sup>nd</sup> of June 2021, AllSourcePPS, Inc. finalized the onboarding process for employment and Plaintiff began work at Delta Air Lines (DAL). Ms. Woods' title was Professional Project Manager II and her initial assignment was at Delta Tech Ops Facility located at Atlanta



Hartsfield International Airport. Ms. Woods employment agreement was a rotation duty period of 7 days On and 7days Off.

14. On or about the 23<sup>rd</sup> of May 2022, Ken Poverud (white male), cursed Ms. Woods out in front of the customer. This situation was communicated to DAL Managers, Patrick Mills (black male) and John Baker (white male). No actions were taken by management to address the volatile situation. Ms. Woods communicated her concern of disrespect directly to Ken Poverud also [**Attachment A**].

15. On or about the 7<sup>th</sup> of June 2022 James Swann (white male) began yelling that he was being harassed at Ms. Woods [**Attachment B**].

16. On or about the 7<sup>th</sup> of June 2022 James Swann (white male) began yelling that he was being harassed at Ms. Woods, after Ms. Woods informed him that his smirking and verbal grunt at her during the meeting was inappropriate. Ms. Woods immediately engaged the Manager on duty Tom Isaacson to join the attempted conversation out of fear of retaliation from James Swann. It was believed that James Swann was attempting to turn the dynamics of the situation against her. Later that same evening, after Tom Isaacsons' discussion with James Swann, James Swann stated *id.* "I apologize for whatever you thought I did to offend you." Also, Tom Isaacson advised that he and James had discussed the situation, and "they did not want to get Atlanta HR involved."

17. On or about the 8<sup>th</sup> of June 2022 Ken Poverud asked Ms. Woods if she was applying for any of the open jobs within the department.

18. On or about the 9<sup>th</sup> of June Ms. Woods received an email from Ken Flemming advising her that a harassment investigation was opened against.

19. On or about the 9<sup>th</sup> of June Ms. Woods called her Manager, Patrick Mills and asked what was going on. Patrick asked if Ms. Woods had shared everything with him and furthered by telling her to just stay quiet and let him handle it.

20. On the 17<sup>th</sup> of June 2022 Ms. Woods provided a written statement for both situations with Ken Poverud [**Attachment A**] and James Swann [**Attachment B**] to Jan Sizer (AllSourcePPS HR) and Krystal Dufus (DAL HR).

21. On or about the 27<sup>th</sup> of June 2022, the initial investigative meeting took place via Teams with Ken Flemming, Jan Sizer and Krystal Dufus. During this meeting is when Ms. Woods finally was informed that she was being investigated for harassment. Ken Poverud allegedly stated that Ms. Woods called him a Whiner on two occasions which hurt his feelings.

22. On or about the 8th of September 2022 Ms. Woods shared her experiences from the 9th of August 2022 with Jan Sizer. Jan Sizer was noticeably taking notes during my conversation with her, yet, no actions were taken to join the investigation. During the meeting white DAL employees made slighted comments in the presence of all team members (over 30 employees) as leadership and HR were present. This inappropriate behavior was publicly displayed and accepted by DAL Management and HR. On this day Ms. Woods experienced was only a preview of the volatile environment of harassment and discrimination allowed at Delta Air Lines, Inc. These comments were made by white DAL employees as management in attendance laughed:

- “The only thing I have to say is , there’s too much testosterone in this room,”
- “A Threesome, I’m going to leave that one alone, moving on,” and
- “Who’s got the Claps.” This was a pun at employees caught clapping at the session that was in play.

23. On or about the 9<sup>th</sup> of August Ms. Woods asked Kristal Dufus (DAL HR) the status of the investigation. I was concerned about the impact of the investigation negatively affecting me from becoming a direct employee. Krystal advised that she had completed all investigations and to reach out to Ken Flemming for feedback.

24. On or about the 11<sup>th</sup> of September 2022 Ms. Woods received a letter of counsel via email, from Jan Sizer [**Attachment F**].

25. On or about the 23<sup>rd</sup> of September 2022, a conversation took place on the commute to work. The conversation was started by John Zwicke (Lead Program Manager) and took place between all three employees on the van. I find it very difficult to believe that John Zwicke stated he was uncomfortable, when in fact he made the comment that, “The Good Ole Boys still run deep” and asked “what did DAL HR say about it.

26. On or about the 28<sup>th</sup> of September 2022 Ms. Woods saw an email, from John Baker, DAL Manager, to another employee requesting detailed concerns and or conversations held with Ms. Woods be sent directly to Ken Flemming. I knew at this moment that a “Witch Hunt” was in full effect to try and find cause for Ms. Woods termination because she did not cower to other employees’ disrespect.

27. On or about October 3<sup>rd</sup>, Ms. Woods received a call from Ken Flemming and Jan Sizer as she was driving. She advised that she had pulled over and was available to talk, yet they decided to reconvene the call for the following day.

28. On the 4<sup>th</sup> of October 2022 Ken Flemming and Jan Sizer called Ms. Woods via Teams. Ken Flemming advised Ms. Woods of her contract termination and stated it was due to a complaint from a DAL employee (John Zwicke, white male) who Ms. Woods made feel uncomfortable. Ken Flemming stated that John Z. felt uncomfortable having to read the disciplinary letter. In fact, the



disciplinary letter provided to Ms. Woods if read by John Zwicke, was not provided to him by Ms. Woods. Ken Flemming also placed emphasis on the fact that he would let Patrick Mills know soon as he got off the phone. I believed this to be a slight at Patrick Mills (black male) because he partook in Ms. Woods being selected for the department.

### **CLAIMS**

#### **COUNT I:**

29. The unequal treatment experienced during the investigative process were violations of Ms. Woods Title VII Civil Rights Act of 1964 as Amended delineated hereinabove proximately caused Plaintiff and her children to suffer physically, financially and mentally. Whereas the departmental Managers were not allowed to address nor investigate the alleged harassment claim against Ms. Woods.

#### **COUNT II:**

30. The preferential treatment provided to white male employee (Ken Poverud) to have his known friend Ken Flemming (General Manager) spearhead and shape the results of the investigative to favor an outcome for his friends' benefit, violated Ms. Woods Title VII Civil Rights Act of 1964 as amended delineated hereinabove proximately caused Plaintiff and her children to suffer physically, financially and mentally.

#### **COUNT III:**

31. The Defendants' (DAL) employees intentionally discriminated against Ms. Woods race and sex only to follow by encouraging acts of discrimination during meetings and this cover up.

#### **COUNT IV:**

32. The Defendant's retaliatory discrimination whereas Manager (John Baker) sent an email requesting negative feedback against Ms. Woods and for the email reply be sent directly to Ken Flemming, were violations of Ms. Woods Title VII Civil Rights Act of 1964 as Amended delineated

hereinabove proximately caused Plaintiff and her children to suffer physically, financially and mentally.

**COUNT V:**

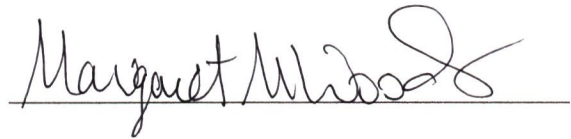
33. The Defendant's Gross negligence of race, sex discrimination and reckless disregard for Ms. Woods Title VII Civil Rights, for which the Defendant should be punished and deterred from similar conduct in the future. The conduct of the Defendant complained of herein was malicious and intentionally coerced. Immensely caused Ms. Woods immense suffering physically, financially and mentally.

**PRAYER FOR RELIEF:**

WHEREFORE, the Plaintiffs pray for the following relief:

1. **Jury Trial Demanded.**
2. Judgment of monetary value for Plaintiff and against the Defendant.
3. Judgement for monetary compensatory damages in an amount which will fully and fairly compensate Plaintiff for self and family's pain and suffering, lost wages, character deformation.
4. Judgement of money for punitive damages in amount which is reasonably and rationally related to the egregiousness of Defendant's conduct, and which is reasonably and rationally related to the financial net worth of the Defendant, and which is in the public interest.
5. Reasonable *pro se* fees, costs and expenses.
6. Such other and further relief as may be deemed just and proper in the premises.

Respectfully submitted on this 10<sup>th</sup> day of July 2024.

A handwritten signature in black ink, appearing to read "Margaret Woods", is written over a horizontal line.

/s/ Margaret Woods, *pro se*

Margaret Woods  
121 Brook Hollow LN  
Red Oak, TX 75154  
404/661-6207

[margaretwoodsmm@gmail.com](mailto:margaretwoodsmm@gmail.com)



## **ATTACHMENT - A**

**1:00 QPM / Quality Focus Meeting - Monday 6/6/2022****~1:55 PM / At the conclusion of the meeting;**

Mr. Poverud had a picture of his foot as the last page of his PowerPoint presentation. This visual was provided and elaborated on by Mr. Poverud to influence Mexicana leadership as to why a Delta office was needed on the first floor or hanger area.

- ❖ I believe David Wharton and Arturo ZamoraMendez (2 additional MPMs) were present at this meeting as well. Ken P. keeps developed this and advised everyone that it is sent to Atlanta Management to show proof of attendance. This list provides some details on who was in attendance.



## Quality Focus Meeting Agenda

06/06/22

**Attendance:**

Ken Poverud X	Gerry Russell	Pedro Gonzalez X	Eduardo Trejo X
Margaret Woods X	David Wharton X	Abner Orozco X	Alfonso Venegas X
Larry Lovegrove	Jose Lamas	Oscar Escalona X	Jorge Gomez
Alberto Carrillo	Tom Underwood X	Luis Navarrete	Eric Gomez X
Kevin Young		Sergio Machorro X	Jose Aderete X
Tom Isaacson		Joaquin Cervantez	
Jim Swann X		Victor Hernandez	

❖

Mr. Poverud talked of the amount of hardware in his lower leg. Several team members (Tom Underwood, James Swann, Ken Poverud) all spoke on health issues in having to climb four flights of stairs multiple times each day.

This lingered for a moment where Delta Reps were talking of health concerns (Tom Underwood, James Swann, Ken Poverud). **My Opinion...** *"The talk was more about guys bragging about who had the biggest scar..."*

I made comment that "I forgot or missed the memo the bring the cheese."

Someone else made comment "yeah, with all this whining going on." Chuckling about the room occurred. I believe David Wharton made the comment, as it did come from my left. Which had to be one of the MPMs.

Then conversation then pointed to the business necessity of always obtaining effective-immediate support from Delta Reps. I commented on the real-time Safety Permit support, which we were having compliance concerns with and how it would be eliminated.

I said nothing else.

Suggestions were provided from MPMs to customer about potential trailers and/or shed like what they already have on the line.

Customer acknowledged request and advised that they were looking into it.

Noone appeared to have any concerns of being offended at any point about their health concern comments or gestures made.

Meeting was convened.

**Tuesday 6/7 – at ~12:30PM**

Incident between Mr. Swann and myself that was agreed upon to drop and not share with ATL.

Also, noticed gathering between Mr. Swann and Mr. Poverud.

**Wednesday 6/8 – at ~12:30PM**

Additional, noticed gatherings (2) between Mr. Swann and Mr. Poverud.

**Thursday 6/9 – at ~9:15 AM**

Notice of harassment investigation against me.

*Margaret M. Woods*

[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)

678.429.0957

**DATE: 17 JUN 2022**



## **ATTACHMENT - B**

**Back-Story:**

**People:** James Swann/MPM – Arturo ZamoraMendez/MPM – Margaret Woods/QPM – Tom Isaacson/MPM Manager

**Friday 6/3** - Upon my arrival at aircraft 3753, I noticed a badly obscured passenger window (L-31).

- I informed MPMs who were at aircraft (David Wharton and Arturo Z.)
- Also communicated and showed it to the aircraft leader real-time at aircraft the 10:00 AM meeting to the Mexicana team.
- During 10:00 AM meeting I informed the Mexicana team that this type of observation should have been identified during first couple of days of visit/ during initial inspections.

**Saturday 6/4** – I followed-up with Inspectors (Victor & Jesus) on the aircraft to ensure they were aware and assisted with paperwork as needed.

**Sunday 6/5** – No actions taken on AC. However, I discussed observation with Art and was advised that the Mexican personnel said they didn't have an issue on AC 3751. Art stated he or David corrected Mexicana, and informed that I said 3753.

**Monday 6/6** – Mexicana advised that they did not have a seal for the window if they were to address the obscured window. I made no further comment on the window. MPMs and other QPM made comments of deferral if needed.

**Tuesday 6/7** – During aircraft walk through, noticed window (L-31) was cleaned/changed.

**CONCERN**

**Tuesday 6/7** – at ~12:30PM

- At end of 12:00PM MX Meeting. I commented to MEX Team, "Oh by the way, Thanks for taking care of the window!"
- **SEATING Arrangement** - Swann was only two seats away from me. Art was one seat away from me. We all sat in proximity at a full oblong meeting table
- James Swann smirked and sounded a noticeable chuckle as he made eye contact with Art.
- I was already in motion to get up as this occurred, took about to steps, bent and quietly told MR. Swann "I got your point, Understand you now."
- ~12:25PM - I walked over and asked Mr. Swann if he had a moment.
- Mr. Swan came to QPM office where he and I were alone.
- I stated to Mr. Swan that I always communicate professionally and openly and had concern with his smirk and chuckle behind my 'Thank you to the team.'
- Mr. Swann argued "how did I know he was smirking; he had his mask on" "You can't see my face... How do you know what I was doing or saying...? My face is covered..."
- I took a deep breath and stated "I saw your facial expression and heard your chuckle, that's why I leaned to you and said that was wrong, I see where you are coming from now."
- Mr. Swann the said in a heightened tone that he felt like I was harassing him for bringing this up. I stated I was only trying to communicate my discomfort with his unprofessional chuckle.
- Mr. Swann continued to say he felt I was harassing him. I stopped talking and told him he was taking it wrong and that I wanted to try and settle this as professionals together.

- **~12:30PM** - Mr. Swann continued raising his voice and remained seated in the QPM office as I walked next door to engage Tom Isaacson.
- After telling Mr. Swann this discussion was over I left to ask Tom Isaacson to come over to mediate and stated, "Mr. Swann was now trying to turn an honest discussion about respect into harassment against me."
- Mr. Swann admitted and simulated to Tom how he chuckled and went on to say he wasn't talking to or about me.
- Tom Isaacson excused himself to attend a meeting and said he would reconvene with us afterwards.
- **~12:36 PM**, I texted my Delta management of issue and did not mention names in hopes to continue discussions with Tom's presence.
- **~3:45PM**, I came back to my office and Ken Poverud was engaged in dissuasion with Tom I. Ken was standing in doorway facing Tom, as Ken turned to leave, Tom was making a statement about "she..." Ken immediately turned back to Tom, Tom stopped conversation and Ken walked away.
- **~3:50PM** Tom Isaacson approached my desk and asked if I wanted to talk to Mr. Swann and informed that he had spoken to his employee, and he (Mr. Swann) did not want to pursue his claims of harassment and felt he'd done nothing wrong. Tom went on to clarify by stating that "he and Mr. Swann did not want this to get to ATL and wanted it handled on site."
- I explained to Tom that's all I was trying to do was to request respect and professionalism when in front of customer or not, in a one-on-one discussion with Mr. Swann. -Until he started raising his voice and repeatedly telling me I was harassing him.
- I further made statement to Tom that "I was not stupid, and I know what Mr. Swann did and I wanted was to have a discussion and for him to respect me as a person."
- **~3:55PM** Tom asked Mr. Swann to enter, and Mr. Swann sat calmly and quiet in QPM office. It was obvious he had been coached.
- I told Mr. Swann and Tom that I had no concerns with agreeing to disagree. But I know what I saw and heard and only want to be respected, the same level of respect I always provide him!
- Mr. Swann then stated that he wasn't talking to me, and he had no idea what I was talking about. Yet apologized stating "I apologize for whatever you thought I did to offend you."
- I agreed to allow this to be put behind us which in essence allowed him to drop his false harassment claims.
- **~5:29 PM** I informed my Delta managers of the incident and resolve.

#### **Wednesday 6/8**

**~10:45 AM** Mr. Swann came into QPM office and leaned over the top of my desk and made what I deem as an irrelevant statement "I didn't know you were leaving MEX".

No gesture of good or bad nature... Which made me further believe that the was up to something of no good.

#### **Thursday 6/9**

**~ 9:10** Became aware of harassment complaint filed against me and an imminent investigation.



**My concerns being false allegations of harassment are:**

- Inability to obtain FTE status with this creation of perceptive harassment and notation on my record.
- This is causing me great distress and worries of continued long-term employment.

*Margaret M. Woods*

[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)

678.429.0957

## **ATTACHMENT - C**



---

## IVR Telephone PIN Invalid Login Notification

1 message

---

**DeltaCommunityAlerts@deltacommunitycu.com**

<DeltaCommunityAlerts@deltacommunitycu.com>

To: MARGARETWOODSMM@gmail.com

Fri, Oct 7, 2022

at 8:51 AM

Your Delta Community IVR (Interactive Voice Response) account access has been temporarily suspended due to multiple invalid Telephone PIN login attempts. If it was you or someone authorized to access the account attempting to login, no action is required at this time. You can attempt to log in again after 15 minutes. If these attempts were not made by you or someone authorized to access the account, we encourage you to update your IVR PIN as soon as possible using the Update Telephone PIN link located under Account Management once logged into your Delta Community Online Banking or via the Delta Community Mobile App. Updating your Telephone PIN will remove the temporary suspension. You can also call our Member Care team at (404) 715-4725 or (800) 544-3328 for 24 hour account assistance. We value your business and are committed to protecting your account information.

*This email communication, including any attached files, may contain material that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. This communication is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the person responsible for delivering this communication to the intended recipient, you are prohibited from retaining, using, disseminating, forwarding, printing or copying this communication. If you have received this communication in error, please immediately notify the sender via return email or telephone.*



---

## Digital Banking Invalid Login Notification

1 message

---

**DeltaCommunityAlerts@deltacommunitycu.com**

<DeltaCommunityAlerts@deltacommunitycu.com>

To: margaretwoodsmm@gmail.com

Thu, Jan 12, 2023  
at 6:07 PM

Your Delta Community Online Banking account access has been temporarily suspended due to multiple invalid login attempts. If it was you or someone authorized to access the account attempting to login, no action is required at this time. You can attempt to log in again after 5 Minutes. If these attempts were not made by you or someone authorized to access the account, we encourage you to change your username and password as soon as possible using the Forgotten Username or Password link near the login form on DeltaCommunityCU.com. You can also call our Member Care team at (404) 715-4725 or (800) 544-3328 for 24 hour account assistance. We value your business and are committed to protecting your account information.





---

## Digital Banking Invalid Login Notification

2 messages

---

**DeltaCommunityAlerts@deltacommunitycu.com**

<DeltaCommunityAlerts@deltacommunitycu.com>

To: margaretwoodsmm@gmail.com

Fri, Feb 10, 2023

at 7:32 AM

Your Delta Community Online Banking account access has been temporarily suspended due to multiple invalid login attempts. If it was you or someone authorized to access the account attempting to login, no action is required at this time. You can attempt to log in again after 15 Minutes. If these attempts were not made by you or someone authorized to access the account, we encourage you to change your username and password as soon as possible using the Forgotten Username or Password link near the login form on DeltaCommunityCU.com. You can also call our Member Care team at (404) 715-4725 or (800) 544-3328 for 24 hour account assistance. We value your business and are committed to protecting your account information.

---

**Margaret W** <margaretwoodsmm@gmail.com>

To: DeltaCommunityAlerts@deltacommunitycu.com

Sat, Feb 11, 2023 at 6:59 AM

Good Day,

My account has been closed and someone has access to the Delta assets I used and is trying to access closed accounts. This is not me!

Thanks,

Margaret Woods

[Quoted text hidden]



---

## Digital Banking Invalid Login Notification

1 message

---

**DeltaCommunityAlerts@deltacommunitycu.com**

<DeltaCommunityAlerts@deltacommunitycu.com>

To: margaretwoodsmm@gmail.com

Sat, Feb 11, 2023

at 6:19 AM

Your Delta Community Online Banking account access has been temporarily suspended due to multiple invalid login attempts. If it was you or someone authorized to access the account attempting to login, no action is required at this time. You can attempt to log in again after 1 Hour. If these attempts were not made by you or someone authorized to access the account, we encourage you to change your username and password as soon as possible using the Forgotten Username or Password link near the login form on DeltaCommunityCU.com. You can also call our Member Care team at (404) 715-4725 or (800) 544-3328 for 24 hour account assistance. We value your business and are committed to protecting your account information.

4/5



---

## Digital Banking Invalid Login Notification

1 message

---

**DeltaCommunityAlerts@deltacommunitycu.com**

<DeltaCommunityAlerts@deltacommunitycu.com>

To: margaretwoodsmm@gmail.com

Sun, Feb 12, 2023

at 5:17 AM

Your Delta Community Online Banking account access has been temporarily suspended due to multiple invalid login attempts. If it was you or someone authorized to access the account attempting to login, no action is required at this time. You can attempt to log in again after 24 Hours. If these attempts were not made by you or someone authorized to access the account, we encourage you to change your username and password as soon as possible using the Forgotten Username or Password link near the login form on DeltaCommunityCU.com. You can also call our Member Care team at (404) 715-4725 or (800) 544-3328 for 24 hour account assistance. We value your business and are committed to protecting your account information.

## **ATTACHMENT - D**





327 West Broadway Blvd. Glendale, CA 91204

---

October 7, 2022

RE: MARGARET WOODS

To Whom It May Concern:

I am the All-In-1 Human Resources Senior Manager, which provides Human Resources support to AllSource PPS, a sister company under the ActOne Group.

Please be advised that Margaret Woods was a Temporary Associate employed by AllSource. Her last date of employment as a Temporary Associate with AllSource is October 4, 2022.

Please let me know if you have any questions by calling me at my contact number below.

Sincerely,

Jan Sizer  
Senior Manager  
Human Resources  
All-In-1  
800/872-2677 x995013

*Serving AllSource PPS*

## **ATTACHMENT - E**

---

## Help Needed

33 messages

---

**Margaret W** <margaretwoodsmm@gmail.com>

Tue, Aug 30, 2022 at 10:58 AM

To: "Michaela (Mikee) Faulkner" <mfaulkner@allsourcepps.com>, jsizer@ain1.com

Good Morning,

I'm not certain who to reach out to for feedback. Please advise.

I have been informed of three newly hired FTE employees into the department and the investigation still stands against me. Two newly hired contractors were offered and one hired.

Have you heard anything?

Thanks,  
Margaret  
404-661-6207

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>

Tue, Aug 30, 2022 at 1:04 PM

To: Margaret W <margaretwoodsmm@gmail.com>, Michaela Faulkner - AllSourcePPS  
<mfaulkner@allsourcepps.com>

Hi Margaret – thanks for reaching out. I just followed up with Ken Fleming and he apologized for the delay but said that the situation is under final review and a meeting with you should take place soon.

He said the delay was due to the fact that there's so much going on in the TechOps world since they are in the middle of the summer fly season, and they have multiple regulatory and operational issues they're battling through.

I will keep you posted as soon as I hear back about the meeting, in which I've asked to be included.

Sincerely,

Jan

1/13

**From:** Margaret W <margaretwoodsmm@gmail.com>  
**Sent:** Tuesday, August 30, 2022 8:59 AM  
**To:** Michaela Faulkner - AllSourcePPS <mfaulkner@allsourcepps.com>; Jan Sizer - Human Resources <jsizer@ain1.com>  
**Subject:** Help Needed

**EXTERNAL EMAIL:** This email comes from an external source. Use caution with links and attachments. [Learn more...](#)

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Jan Sizer - Human Resources <jsizer@ain1.com>

Tue, Aug 30, 2022 at 1:33 PM

Thanks Jan!

[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>  
To: Margaret W <margaretwoodsmm@gmail.com>

Tue, Aug 30, 2022 at 4:25 PM

You're welcome!

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Jan Sizer - Human Resources <jsizer@ain1.com>

Fri, Sep 9, 2022 at 2:24 PM

Hi Jan,

I called in to the scheduled meeting as it was being cancelled and briefly spoke to Ken at ~9:25AM CST. He advised that closure was being provided and that I should expect a call from you by 1:00 PM CST. Any update on this?

Thanks,  
Margaret

[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>  
To: Margaret W <margaretwoodsmm@gmail.com>

Fri, Sep 9, 2022 at 3:02 PM

Hi Margaret – when are you available? It's 1 pm my time.

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Jan Sizer - Human Resources <jsizer@ain1.com>

Fri, Sep 9, 2022 at 3:31 PM

I'm available for the next 2 hrs!

[Quoted text hidden]



Jan Sizer - Human Resources <jsizer@ain1.com>

Fri, Sep 9, 2022 at 3:37 PM

To: Margaret W <margaretwoodsmm@gmail.com>

Shall I send you a Teams invite?

[Quoted text hidden]

---

Margaret W <margaretwoodsmm@gmail.com>

Fri, Sep 9, 2022 at 7:23 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>

Yes, please!

[Quoted text hidden]

---

Jan Sizer - Human Resources <jsizer@ain1.com>

Fri, Sep 9, 2022 at 7:32 PM

To: Margaret W <margaretwoodsmm@gmail.com>

Hi Margaret – I was able to locate the letter and wanted to send it to you. Please review and let me know how you'd like to proceed.

I know that Ken is out all next week, but he indicated there would be a follow up meeting upon his return. I'll check with him to ensure that is the case and keep you posted.

Have a nice weekend!

[Quoted text hidden]



MW Final Coaching.pdf

53K

---

Margaret W <margaretwoodsmm@gmail.com>

Tue, Sep 13, 2022 at 9:50 AM

To: "Mills, Patrick" <patrick.mills@delta.com>

Good Morning Pat,

How should I proceed?

Margaret

[Quoted text hidden]



MW Final Coaching.pdf

53K

Sign, date, scan and send it back to her acknowledging the counseling.

**Pat Mills**

**Manager Quality Assurance Oversight**

**TechOps Diversity Council Co-Chair**

**K-12 Outreach Subcommittee Chair**

**#UntilWeAllCare**

**Technical Operations Center**



**Work 404-773-7210**

**Cell 404-374-5948**



**EXTRAORDINARY PEOPLE DESERVE  
EXTRAORDINARY RECOGNITION.**

**Honoree**

This message (and any attachments) contains confidential and proprietary/trade secrets of Delta Air Lines, Inc. or its subsidiaries. Any unauthorized reading, access, distribution, copying, or other use of this message or its attachments is strictly prohibited.

**From:** Margaret W <margaretwoodsmm@gmail.com>

**Sent:** Tuesday, September 13, 2022 10:51 AM

**To:** Mills, Patrick M <patrick.mills@delta.com>

**Subject:** [EXTERNAL] Fwd: Help Needed

This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

**Margaret W** <margaretwoodsmm@gmail.com>

Tue, Sep 13, 2022 at 11:13 AM

To: Jan Sizer - Human Resources <jsizer@ain1.com> Case 3:24-cv-01759-B-BT Document 3 Filed 07/10/24 Page 31 of 43 PageID 35

Hi Jan,  
Do you have a moment to talk today?

Thanks  
Margaret  
[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>

Tue, Sep 13, 2022 at 11:14 AM

To: "Woods, Margaret" <margaret.woods00@delta.com>

----- Forwarded message -----

From: **Jan Sizer - Human Resources** <jsizer@ain1.com>

Date: Fri, Sep 9, 2022 at 8:32 PM

Subject: RE: Help Needed

To: Margaret W <margaretwoodsmm@gmail.com>

[Quoted text hidden]



**MW Final Coaching.pdf**

53K

---

**Woods, Margaret** <margaret.woods00@delta.com>

Tue, Sep 13, 2022 at 3:54 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>

Cc: Margaret W <margaretwoodsmm@gmail.com>

Hi Jan,

Please advise;

- What restrictions does this letter have on my employment should an inquiry be made of my employment and or performance?
- What, if any options do I have?
- Do you know why my manager was not allowed to be informed or take part in the investigation or speak to me about my concerns?
- Do you know why employee claim went directly to GM vs. the Department Managers Pat & Jack?
- Were you part of the investigation/discussions with the other employees?

I'm prepared to send the Acknowledgment of Receipt of the letter.

Sincerely!

*Margaret M. Woods*

[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)

678.429.0957



Tech Ops - QA

---

**From:** Margaret W <margaretwoodsmm@gmail.com>  
**Sent:** Tuesday, September 13, 2022 10:14 AM  
**To:** Woods, Margaret <margaret.woods00@delta.com>  
**Subject:** [EXTERNAL] Fwd: Help Needed

This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

---

----- Forwarded message -----

[Quoted text hidden]

[Quoted text hidden]

---

**Woods, Margaret** <margaret.woods00@delta.com>

Thu, Sep 15, 2022 at 9:59 AM

To: Jan Sizer - Human Resources <jsizer@ain1.com>, Michaela Faulkner - AllSourcePPS  
<mfaulkner@allsourcepps.com>

Cc: Margaret W <margaretwoodsmm@gmail.com>

Good Day Jan,

Please note attached Acknowledgement of Receipt.



Best Regards,

Case 3:24-cv-01759-B-BT Document 3 Filed 07/10/24 Page 33 of 43 PageID 37

*Margaret M. Woods*

[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)

Quality Program Manager

EMP Oversight / SAL

678.429.0957



Tech Ops - QA

---

**From:** Jan Sizer - Human Resources <[jsizer@ain1.com](mailto:jsizer@ain1.com)>

**Sent:** Tuesday, September 13, 2022 4:49 PM

**To:** Woods, Margaret <[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)>

**Subject:** RE: [EXTERNAL] Fwd: Help Needed

I completely understand.

---

**From:** Woods, Margaret <[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)>

**Sent:** Tuesday, September 13, 2022 2:40 PM

**To:** Jan Sizer - Human Resources <[jsizer@ain1.com](mailto:jsizer@ain1.com)>

**Subject:** Re: [EXTERNAL] Fwd: Help Needed

**EXTERNAL EMAIL:** This email comes from an external source. Use caution with links and attachments. [Learn more...](#)

Thanks Jan,

I appreciate your effort. I only want to be provided the respect to have my questions answered professionally.

Regards,

Margaret

Sent from my iPhone

Hi Margaret – I've already reached out to Ken asking for a follow up meeting with all of us, to which he agreed. He'd be the best person to answer your questions, so as soon as he returns from vacation, we can proceed with the meeting.

I'll let you know as soon as I hear anything further.

Take care,

Jan

---

**From:** Woods, Margaret <[margaret.woods00@delta.com](mailto:margaret.woods00@delta.com)>  
**Sent:** Tuesday, September 13, 2022 1:54 PM  
**To:** Jan Sizer - Human Resources <[jsizer@ain1.com](mailto:jsizer@ain1.com)>  
**Cc:** Margaret W <[margaretwoodsmm@gmail.com](mailto:margaretwoodsmm@gmail.com)>  
**Subject:** RE: [EXTERNAL] Fwd: Help Needed

**EXTERNAL EMAIL:** This email comes from an external source. Use caution with links and attachments. [Learn more...](#)

Hi Jan,

Please advise;

- What restrictions does this letter have on my employment should an inquiry be made of my employment and or performance?
- What, if any options do I have?
- Do you know why my manager was not allowed to be informed or take part in the investigation or speak to me about my concerns?
- Do you know why employee claim went directly to GM vs. the Department Managers Pat & Jack?
- Were you part of the investigation/discussions with the other employees?

I'm prepared to send the Acknowledgment of Receipt of the letter.

Sincerely!

*Margaret M. Woods*

EMP Oversight / SAL

678.429.0957



Tech Ops - QA

[Quoted text hidden]



**MW Final Coaching\_15SEP2022..pdf**  
188K

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>

Mon, Sep 19, 2022 at 2:43 PM

To: "Woods, Margaret" <margaret.woods00@delta.com>, Michaela Faulkner - AllSourcePPS  
<mfaulkner@allsourcepps.com>

Cc: Margaret W <margaretwoodsmm@gmail.com>

Thank you Margaret.

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>

Mon, Sep 19, 2022 at 2:45 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>

Cc: Michaela Faulkner - AllSourcePPS <mfaulkner@allsourcepps.com>, "Woods, Margaret"  
<margaret.woods00@delta.com>

You're welcome!

[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>

Mon, Oct 3, 2022 at 8:25 PM

To: Margaret W <margaretwoodsmm@gmail.com>

Hi Margaret – Ken would like to have a conference call or Teams meeting tomorrow morning at 9 am PDT (11:00 am your time I believe?). Can you please be available for that call?

We'll keep you posted on how it will occur. Thanks much.

[Quoted text hidden]

You're welcome!

[Quoted text hidden]

Thank you Margaret.

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]



Tech Ops - QA

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Jan Sizer - Human Resources <jsizer@ain1.com>

Mon, Oct 3, 2022 at 8:28 PM

Thanks Jan,

No Problem. I'm free tomorrow. I happened to be out all day today and just made it back in about 30 minutes ago.

Margaret

[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>  
To: Margaret W <margaretwoodsmm@gmail.com>

Mon, Oct 3, 2022 at 8:32 PM

Great – thanks much.

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Jan Sizer - Human Resources <jsizer@ain1.com>

Mon, Oct 3, 2022 at 8:42 PM

You're welcome!

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: "Michaela (Mikee) Faulkner" <mfaulkner@allsourcepps.com>, jsizer@ain1.com

Wed, Oct 5, 2022 at 11:50 AM

Hi Jan/Michaela,

I didn't hear back from you yesterday. Please advise on what I need to do in order to move forward with trying to secure a job?

I'm applying for jobs and state support, but state support will not pay rent.

Also, I have questions about my remaining medical benefits if any for this month.

10/13



Please advise asap.

Case 3:24-cv-01759-B-BT Document 3 Filed 07/10/24 Page 37 of 43 PageID 41

Regards,  
Margaret  
404-661-6207  
[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>

Wed, Oct 5, 2022 at 1:09 PM

To: Margaret W <margaretwoodsmm@gmail.com>, Michaela Faulkner - AllSourcePPS  
<mfaulkner@allsourcepps.com>

Hi Margaret – thanks for reaching out. I've put some feelers out to AllSTEM for any positions they may have. You are free to check the AppleOne website as well to see if their staffing services would suit your needs. They have offices in Texas.

I'll send you a letter with your dates of employment if that will assist you.

AllSource doesn't operate in the same manner as other staffing agencies since they don't normally recruit candidates for positions but work with clients to onboard and payroll candidates referred to them.

Hi Michaela – let us know if that is correct or if you can assist in any way.

---

**From:** Margaret W <margaretwoodsmm@gmail.com>

**Sent:** Wednesday, October 5, 2022 9:51 AM

**To:** Michaela Faulkner - AllSourcePPS <mfaulkner@allsourcepps.com>; Jan Sizer - Human Resources <jsizer@ain1.com>

**Subject:** Re: Help Needed

**EXTERNAL EMAIL:** This email comes from an external source. Use caution with links and attachments. [Learn more...](#)

Hi Jan/Michaela,

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>

Wed, Oct 5, 2022 at 1:11 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>

11/13

Thanks!

I've attached my resume.

Case 3:24-cv-01759-B-BT Document 3 Filed 07/10/24 Page 38 of 43 PageID 42

Margaret

[Quoted text hidden]



**Resume And CL\_MWoods\_06APR22.pdf**

269K

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>

Wed, Oct 5, 2022 at 2:07 PM

To: Margaret W <margaretwoodsmm@gmail.com>

Thanks, Margaret – I've provided your resume to my AllSTEM contact and they said someone will reach out to you to discuss your job search and see if they have anything that matches your skills, etc.

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>

Wed, Oct 5, 2022 at 10:17 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>

Thank you!

[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>

Thu, Oct 6, 2022 at 12:36 PM

To: Margaret W <margaretwoodsmm@gmail.com>

You're welcome!

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>

Fri, Oct 7, 2022 at 3:57 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>, "Michaela (Mikee) Faulkner"

<mfaulkner@allsourcepps.com>

Hi Jan,

I'm in need of a letter showing proof of my employment ending by or last day worked, with AllSource.

The Texas Benefits office requires this letter in order to finish their review of my application for assistance.

Please provide asap.

Thanks,  
Margaret

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>

Fri, Oct 7, 2022 at 3:59 PM

To: Jan Sizer - Human Resources <jsizer@ain1.com>, "Michaela (Mikee) Faulkner"

<mfaulkner@allsourcepps.com>

12/13

I would like to get this processed today please

Thanks

Margaret

[Quoted text hidden]

---

**Jan Sizer - Human Resources** <jsizer@ain1.com>  
To: Margaret W <margaretwoodsmm@gmail.com>

Fri, Oct 7, 2022 at 4:37 PM

Hi Margaret – please see attached. Hope this helps.

[Quoted text hidden]



**Margaret Woods VOE.pdf**  
101K

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Jan Sizer - Human Resources <jsizer@ain1.com>

Fri, Oct 7, 2022 at 4:46 PM

Thank you!

[Quoted text hidden]

---

**Margaret W** <margaretwoodsmm@gmail.com>  
To: Margaret W <Margaretwoodsmm@gmail.com>

Tue, Jun 13, 2023 at 4:48 PM

----- Forwarded message -----

From: **Jan Sizer - Human Resources** <jsizer@ain1.com>

Date: Wed, Oct 5, 2022 at 1:09 PM

Subject: RE: Help Needed

[Quoted text hidden]

[Quoted text hidden]

## **ATTACHMENT - F**





16371 Beach Boulevard  
Suite 141  
Huntington Beach, CA 92647  
866 650 4461

**Ken Fleming**  
General Manager  
Quality Assurance

To: Margaret Woods  
Date: September 6, 2022  
Re: Letter of Concern Regarding Conduct  
CC: Jan Sizer

Margaret, I want to see you succeed as an AllSource Temporary Associate on assignment at Delta but I am concerned about the allegations of inappropriate comments made by you toward a fellow coworker. During a professional meeting you referred to a coworker as a 'whiner.' This allegation was corroborated by multiple peers.

While the comment was not made with malice, it was offensive to other members of your team and attendees in the meeting where it was said. At Delta we cannot tolerate commentary about others that could be belittling, offensive or intentionally hurtful.

Positive team and maintenance provider interaction and engagement are core requirements of your position. Going forward, please keep in mind Delta's and AllSource's expectations that all employees treat each other, our customers, and those we interact with professionally.

My goal is to clearly establish expectations going forward to ensure the behavior is not repeated. This coaching will be submitted to AllSource for their records.

Margaret, please understand the importance of always maintaining satisfactory job performance and take the necessary steps for immediate and lasting improvement. I am confident of your ability to succeed. I am willing to assist you, but the ultimate responsibility for improvement is yours.

---

I have read and fully understand the contents of this letter.

Jan, I sincerely do not understand the rationale behind the contents of this letter. As I have yet to discuss this discipline with any of my leadership. However, - I accept and own the indirect gesture I made in the team setting of "forgetting or not getting the memo to bring the cheese." This indirect gesture was merely the joining in on the other team members lighthearted commentary. Another team member made statement of "with all this whining going on." Please accept my acknowledgement of receipt of this letter.

Acknowledgment of Receipt

Date 15 SEPT 2022

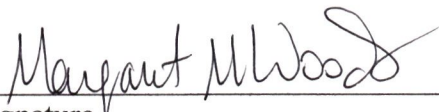
cc: Ken Fleming, General Manager, Quality Assurance  
Jan Sizer, Senior Manager-Human Resources All in One, supporting AllSource



***Certificate of Service***

On 10<sup>th</sup> of July 2024, I filed Civil Complaint with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all known counsel and/or *pro se* parties of record by a manner authorized by Federal Rules of Civil Procedure 5 (b)(2).

**Delta Air Lines, Inc**  
c/o Ken Fleming, General Manager  
1775 Maynard H. Jackson Service Rd.  
Atlanta, GA 30354  
404-374-5948  
866-676-3358

  
\_\_\_\_\_  
Signature  
Margaret M. Woods pro se'  
121 Brook Hollow LN  
Red Oak, TX 75154  
[margaretwoodsmm@gmail.com](mailto:margaretwoodsmm@gmail.com)  
404-661-6207

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Margaret M. Woods, pro se'

(b) County of Residence of First Listed Plaintiff **Ellis**  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

121 Brook Hollow LN  
Red Oak, TX 75154

404-661-6207

Unknown

RECEIVED

DELTA AIR LINES, INC.

JUL 1

County of Residence of First Listed Defendant **FULTON**  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

3-24CV1759-B

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>LABOR</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title VII of the Civil Rights Act of 1964 as Amended

Brief description of cause:

Wrongful Termination Due to Employment Race, Sex and Retaliatory Discrimination

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
350,000.00

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE Sidney A. Fitzwater

DOCKET NUMBER 3:23-cv-02745-D

DATE

SIGNATURE OF ATTORNEY OF RECORD

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_